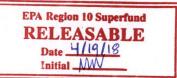


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Jeffrey C. Miller jeff.miller@millernash.com



November 14, 2011

# BY FIRST-CLASS MAIL AND ELECTRONIC MAIL

Ms. Maria J. Litman Complex Director AIG Domestic Claims, Inc. Environmental Claims Department 101 Hudson Street, 30th Floor Jersey City, New Jersey 07302

Mr. Stephen Ginolfi The Hartford The Hartford Headquarters One Hartford Plaza, T-7-92 Hartford, Connecticut 06155 Mr. Jeffrey M. Tatera Environmental Claims Specialist, Truck Insurance Exchange Farmers Insurance Group 8780 19th Street, #189 Alta Loma, California 91701

Ms. Claire Louis Direct Claim Account Manager Resolute Management Inc. Northeast Division Two Central Square Cambridge, Massachusetts 02139

Subject:

Insured:

Kaiser Gypsum Company, Inc.

Site: Insurers: Lower Duwamish Waterway Superfund Site Certain Underwriters at Lloyd's, London

London and Edinburgh Insurance Company National Union Fire Insurance Company of Pittsburgh, PA

Truck Insurance Exchange

Subject:

Demand for Reimbursement of Defense Costs Incurred

through September 30, 2011

Dear Maria, Jeffrey, Stephen, and Claire:

We are writing to submit for reimbursement the defense costs incurred by Kaiser Gypsum Company, Inc. ("Kaiser Gypsum") through September 30, 2011, in connection with the Lower Duwamish Waterway Superfund Site. During this period, Kaiser Gypsum incurred legal fees and costs of \$75,154.41 as documented on the enclosed invoices.



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Ms. Maria J. Litman Mr. Jeffrey M. Tatera Mr. Stephen Ginolfi Ms. Claire Louis November 14, 2011 Page 2

To date, a majority of the legal fees and costs that have been incurred are connected with the review of available historical documents retained by Kaiser Gypsum that are relevant to Kaiser Gypsum's legal obligation to submit a supplemental response to the information demands served on Kaiser Gypsum by the U.S. Environmental Protection Agency ("EPA") pursuant to its information gathering authority under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e). As we have previously stated, Kaiser Gypsum's knowledge of its historical operations on the Lower Duwamish Waterway is based solely on the historical documents retained by the company after its Seattle facilities were closed and/or sold. Kaiser Gypsum and its parent, Kaiser Cement Corporation (nka Hanson Permanente Cement, Inc.) ("Kaiser Cement") retained more than 7,500 boxes of historical corporate documents that may contain materials and information responsive to EPA's Section 104(e) information demands. Our review involved culling through inventories to identify boxes with potentially responsive documents and then reviewing the documents in those boxes to gather information that must be incorporated into Kaiser Gypsum's response to the EPA's Section 104(e) information demand.

As you know, under Washington law any one of an insured's primary insurers must pay all defense costs without regard to other insurers that may also owe coverage. See American Nat'l Fire Ins. Co. v. B & L Trucking & Constr. Co., 134 Wn.2d 413, 429 (1998). Instead of selecting just one of the primary insurers, we are submitting the defense costs to all the primary insurers so that you can discuss cost-sharing arrangements with each other. Kaiser Gypsum is not interested in participating in such discussions, but will cooperate as necessary by providing any requested information that might facilitate timely reimbursement of its defense costs.

As you were previously advised, we also represent Kaiser Cement with respect to the Lower Duwamish Waterway Superfund Site. We already submitted for reimbursement the defense costs that Kaiser Cement has incurred in separate correspondence dated November 10, 2011. However, you should be aware that Kaiser Cement and Kaiser Gypsum are separate companies that historically had separate operations on the Lower Duwamish Waterway. We understand that there may



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Ms. Maria J. Litman Mr. Jeffrey M. Tatera Mr. Stephen Ginolfi Ms. Claire Louis November 14, 2011 Page 3

have been confusion when each of these companies tendered a request for coverage to your respective carriers. However, our clients have asked us to make clear to you the following facts:

- the claims tendered to the primary insurers by Kaiser Cement and Kaiser Gypsum are separate and distinct claims for coverage under the primary layer liability policies;
- Kaiser Cement and Kaiser Gypsum are separate legal entities that owned and operated different facilities at different locations during different time periods on the Lower Duwamish Waterway;
- Kaiser Cement and Kaiser Gypsum each received separate Section 104(e) information demands from the EPA; and
- Kaiser Cement and Kaiser Gypsum have responded and continue to separately respond to EPA's Section 104(e) information demands and will continue to incur separate and distinct defense costs in doing so.

We expect that the primary insurers will collectively reimburse Kaiser Gypsum for its defense costs in a reasonable period of time. Payment may be made by issuing a check to *Hanson Permanente Cement*, *Inc.* Please send the check or checks to me at the address listed above and we will forward to Kaiser Gypsum.

If you have any questions, please e-mail me at <u>jeff.miller@millernash.com</u> or call me or Steve Hill at 360-699-4771.

7-c2 (01)

Enclosures

# Bills Rendered 039391 Three Rivers Management, Inc.

Select criteria:

Beginning Date: 01/01/00 Ending Date: 10/31/11

MATTER NUMBER	PREBILL NUMBER	INVOICE NUMBER	INVOICE DATE	INVOICE TOTAL	BILLED FEES	BILLED COSTS
0006 LDW-	Kaiser Gypsum Co	ompany, Inc En	vironmental			
	534807	505745	04/26/10	\$5,929.30	\$5,915.00	\$14.30
	537354	507980	05/28/10	\$5,368.60	\$5,367.00	\$1.60
	542539	511659	07/30/10	\$8,830.26	\$8,633.00	\$197.26
	545257	512989	08/23/10	\$1,252.00	\$1,142.50	\$109.50
	547861	514771	09/22/10	\$4,618.44	\$4,617.00	\$1.44
	552948	517821	11/29/10	\$1,010.35	\$868.00	\$142.35
	555405	520543	12/29/10	\$5,829.00	\$5,829.00	\$0.00
	557813	522027	01/26/11	\$360.00	\$360.00	\$0.00
	560374	523895	02/24/11	\$6,227.00	\$6,227.00	\$0.00
	562968	525967	03/31/11	\$3,548.00	\$3,548.00	\$0.00
	565577	527736	04/29/11	\$4,907.35	\$4,698.00	\$209.35
	568080	529629	05/31/11	\$911.50	\$911.50	\$0.00
	570517	530343	06/28/11	\$3,158.00	\$3,158.00	\$0.00
	573000	533282	07/29/11	\$3,208.83	\$2,741.00	\$467.83
	575464	534555	08/24/11	\$683.50	\$683.50	\$0.00
	577698	536219	09/27/11	\$8,963.50	\$8,963.50	\$0.00
	579961	537032	10/21/11	\$10,348.78	\$9,671.50	\$677.28
			Matter Total	\$75,154.41	\$73,333.50	\$1,820.91
			Client Total	\$75,154.41	\$73,333.50	\$1,820.9



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Invoice No: 505745

April 26, 2010

Three Rivers Management, Inc. Attn: Mr. James L. Wallmann Corporate Counsel Manor Oak One, Suite 200 1910 Cochran Road Pittsburgh, PA 15220

For professional services through 03/31/10

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	<u>Professional</u>	Time	Amount	Description of Services
02/26/10	(b) (6)	1.4	(b) (6)	Review EPA Web site re (1.1) and prepare correspondence to Mr. Wallmann re (.3) initial information on LDW Superfund Site
03/01/10		2.0		Review EPA and Ecology documents re LDW Superfund Site and BPB Gypsum site (2.0)
03/04/10		0.6		Strategy conference re status of LDW Superfund Site and information known about Kaiser Gypsum's involvement (.6)
03/04/10		1.2		Review status of LDW cleanup and Ecology study re river mile 1.2-1.7 (.7); strategy conference re site status and how to respond to Section 104(e) request (.5)
03/08/10		2.3		Review draft memorandum re status of LDW Superfund Site investigation and feasibility study (1.2), and EPA website re LDW Site maps and sediment management areas (.6); review and respond to correspondence from
				Mr. Wallmann re confirmation that Kaiser Gypsum owned and operated a gypsum facility in Seattle from 1954 to 1978 (.5)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number (b) (6)

Three Rivers Management, Inc. 039391.0006 April 26, 2010

<u>Date</u>	Professional	<u>Time</u>	Amount	Description of Services
03/08/10	(b) (6)	3.3	(b) (6)	Research LDW status, sediment management areas, and BPB Gypsum site information (1.6); prepare summary (1.7)
03/09/10		0.5		Continue to review information on LDW Site (.4); review and respond to correspondence from Mr.  Wallmann re conference call to discuss LDW Site (.1)
03/11/10		2.5		Prepare for and participate in communication with Mr. Wallmann re information known on LDW Superfind Site and strategy for responding to Section 104(e) information request (2.2); review EPA's website re new information on LDW Superfund Site (.3)
03/11/10		2.7		Research LDW Superfund Site re costs to-date, PRPs, and Section 104(e) recipients (1.2); prepare for and attend strategy conference re response to Section 104(e) request and whether to tender claims to insurers (1.5)
03/12/10		. 0.1		Prepare summary of LDW Superfund site and site status, sediment management areas, and Kaiser Gypsum parcel information (.1)
03/16/10		1.1		Continue to prepare summary of LDW Superfund Site and site status, sediment management areas, and Kaiser Gypsum parcel information (1.1)
03/17/10		1.9		Review and revise memorandum re summary of details on LDW Superfund Site and potential involvement of Kaiser Gypsum (1.7); strategy conference re revisions to memorandum (.2)
03/17/10		0.2		Continue to prepare summary of LDW Superfund Site and site status, sediment management areas, and Kaiser Gypsum parcel information (.2)
03/18/10		0.9		Revise and finalize memorandum re summary of information on LDW Superfund Site and Kaiser Gypsum's connection to the site (.7); prepare correspondence to Mr. Wallmann re memorandum (.2)
03/18/10		1.1		Finalize summary of LDW Superfund Site and site status, sediment management areas, and Kaiser Gypsum parcel information (1.1)
03/26/10		0.3		Review new list of general notice letter recipients (.1); prepare correspondence to Mr. Wallmann re list of general notice letter recipients (.2)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 2

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Three Rivers Management, Inc. 039391.0006 April 26, 2010

#### Time Summary

Professional	<u>Time</u>	Rate	Amount
(b) (6)	10.4	(b) (6)	
	11.7		
Summary Total:	22.1		\$5,915.00

#### **Disbursement Summary**

Disbursements	<u>Amount</u>
Search services by U.S. Environmental Protection Agency	14.30
Disbursement Total:	\$14.30

Total fees:

\$5,915.00

Total disbursements:

<u>\$14.30</u>

Total amount due:

\$5,929.30



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Invoice No: 507980

May 28, 2010

Three Rivers Management, Inc. Attn: Mr. James L. Wallmann Corporate Counsel Manor Oak One, Suite 200 1910 Cochran Road Pittsburgh, PA 15220

For professional services through 04/30/10

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	<b>Professional</b>	<u>Time</u>	Amount	Description of Services
02/25/10	(b) (6)	0.1	(b) (6)	Research major PRPs at Lower Duwamish Waterway Superfund site (.1) ("LDW")
03/05/10		0.9		Prepare summary of site and associated parties (.9)
03/26/10		0.2		Review LDW Superfund site GNL list from FOIA request (.2)
04/05/10		0.2		Review correspondence from Mr. Wallmann re review of draft response to EPA concerning Kaiser Gypsum's involvement in wallboard facility in Seattle (.2)
04/06/10		2.6		Review draft response to EPA's Section 104(e) information request (1.1); communication with Mr. Wallmann re initial comments on draft Section 104(e) response (.4); review correspondence from Mr. Wallmann re additional Section 104(e) request to Kaiser Cement (.8); strategy conference re review of information concerning Kaiser Cement's involvement on

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent-per month (9 percent annually).

Page 1

LDW (.3)

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number(b) (6)

Three Rivers Management, Inc. 039391.0006 May 28, 2010

Date	<b>Professional</b>	<u>Time</u>	Amount	Description of Services
04/06/10	(b) (6)	0.5	(b) (6)	Review Kaiser Cement Section 104(e) information request and research whether extensions are available to the 60-day period to respond to Section 104(e) requests (.5)
04/07/10		1.1		Review information re (.5) and prepare correspondence to Mr. Wallmann re (.6) Kaiser Cement's involvement at LDW
04/12/10		2.0		Prepare for and participate in conference call with Mr. Wallmann and Ms. McCarthy re preparation of Section 104(e) responses for Kaiser Cement and Kaiser Gypsum (1.6); strategy conference re request for extension of time to respond to information request and obtaining title reports on Seattle properties (.4)
04/12/10		1.6		Prepare for and participate conference call re responses to Section 104(e) information requests (1.6)
04/15/10		0.3		Conference with Fidelity National Title re chain of title guarantee (.3)
04/16/10		1.5		Prepare requests for extensions of time to respond to the Section 104(e) requests (1.5)
04/19/10		0.2		Review correspondence from Mr. Wallmann re letters to EPA seeking extension of time to respond to Section 104(e) request (.2)
04/22/10		0.1		Conference with Fidelity National Title re chain of title guarantee status (.1)
04/23/10		0.3		Review correspondence from Mr. Wallmann re EPA letter granting request for extension (.1); review and revise initial response to Section 104(e) request (.2)
04/26/10		0.3		Conference with Fidelity National Title re chain of title guarantee (.3)
04/26/10		0.3		Review correspondence from Mr. Wallmann re letter from EPA granting extension to respond to Section 104(e) request (.1); strategy conference re status of title report for properties formerly owned by Kaiser Gypsum and Kaiser Cement (.2)
04/27/10		4.2		Review chain of title guarantee (.9); research legal descriptions and plat property ownership (3.3)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 2

This statement may not include expense items for which we have not yet been billed, or payments received (6) (6) statement date. Employer Identification Number (C2004565

Three Rivers Management, Inc. 039391.0006 May 28, 2010

<u>Date</u>	Professional	<u>Time</u>	Amount	Description of Services
04/28/10	(b) (6)	2.6	(b) (6)	Continue to review and prepare ownership history (2.3); communication with Fidelity National Title re memorandum of lease (.3)
04/28/10		0.9		Review title report re ownership of properties along LDW by Kaiser Cement and Kaiser Gypsum (.6); strategy conference re title documents and corporate history (.3)
04/29/10		1.3		Review and revise ownership history chart (1.0); conference re lease encumbrance (.3)
04/29/10		0.9		Review title report for ownership of sites along LDW (.6); strategy conference re details of title report (.3)

# Time Summary

Professional (b) (6)	Time 8.5 4.8 8.8	Rate (b) (6)	Amount
Summary Total:	22.1		\$5,367.00

# **Disbursement Summary**

Disbursements	Amount
Photocopy expense	\$1.60
Disbursement Total:	\$1.60

Total fees:

\$5,367.00

Total disbursements:

\$1.60

Total amount due:

\$5,368.60



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Invoice No: 511659

July 30, 2010

Three Rivers Management, Inc. Attn: Mr. James L. Wallmann Corporate Counsel Manor Oak One, Suite 200 1910 Cochran Road Pittsburgh, PA 15220

For professional services through 06/30/10

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	<b>Professional</b>	<u>Time</u>	Amount	<b>Description of Services</b>
05/03/10	(b) (6)	0.4	(b) (6)	Continue to review chain of title report re ownership of property along LDW by Kaiser Gypsum, Inc. ("KGC") (.4)
05/14/10		0.5		Review working file to prepare for filing and electronic storage (.5)
05/21/10		0.5		Review draft Section 104(e) response for KGC (.2); communication with (.2) and prepare correspondence to (.1) Mr. McChesney re status of response to Section 104(e) requests for KGC
05/24/10		0.2		Review and respond to correspondence from Mr. McChesney re status of Section 104(e) response for KGC (.2)
05/26/10		0.9		Prepare for and participate in conference call with Mr. McChesney re status of Section 104(e) responses and scope of documents that may be relevant to response (.9)
05/26/10		0.9		Prepare for and participate in conference call with Mr. McChesney re response to Section 104(e) information requests from EPA (.9)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent, per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number (b) (6)

Three Rivers Management, Inc. 039391.0006 July 30, 2010

<u>Date</u>	Professiona		Amount	<u>Description of Services</u>
05/27/10	(b) (6)	0.3	(b) (6)	Review information on KGC documents re Seattle facilities (.1); review and respond to correspondence from Mr. McChesney re discussion with asbestos counsel concerning documents relevant to EPA information request (.2)
05/27/10		0.3		Review law re scope of Section 104(e) information request authority (.3)
05/28/10		0.9		Prepare for and participate in conference call with Messrs. Just and McChesney re documents to review in response to EPA Section 104(e) response (.8); review correspondence from Mr. Just re KGC document index (.1)
06/01/10		0.2		Review correspondence from Mr. Just re document index for KGC documents (.4)
06/02/10		0.8		Prepare for and participate in conference call re review of document indexes to determine potential for responsive documents to Section 104(e) request (.8)
06/04/10		0.3		Review correspondence from Mr. Just re product bulletins (.3)
06/07/10		0.5		Review file index for document review (.2); strategy conference re review of product bulletins for Seattle facility (.3)
06/08/10		1.4		Review product bulletins re KGC products used and produced at Seattle plant (1.4)
06/08/10		0.2		Review proximity of early action cleanup site to Kaiser parcel (.2)
06/09/10		1.2		Prepare for and participate in conference call with Mr. McChesney re strategy for responding to EPA's Section 104(e) request (.7); review product bulletins related to KGC's Seattle operations (.5)
06/09/10		0.1		Strategy conference re review of product summary sheets (.1)
06/10/10		0.2		Communication with Ms. Hong at EPA re request for extension of Section 104(e) information request (.2)

Three Rivers Management, Inc. 039391.0006 July 30, 2010

<u>Date</u>	Professional	<u>Time</u>	Amount	Description of Services
06/11/10	(b) (6)	0.4	(b) (6)	Property ownership chain of title report (.3); correspondence to Ms. Luxmore, Fidelity National Title, re chain of title report for additional parcel (.1)
06/11/10		0.9		Communications with Ms. Hong re request for additional extension of time to respond to Section 104(e) request (.2), and re list of properties previously owned by KGC on Duwamish waterway (.2); prepare correspondence to Mr. McChesney re EPA's refusal to grant additional extension and strategy for responding to Section 104(e) request (.2); strategy conference re additional title search and process for review of documents to respond to Section 104(e) requests (.3)
06/15/10		0.3		Review and revise draft Section 104(e) response (.3)
06/16/10		2.6		Prepare for and participate in communication with Mr. McChesney re preparation of draft preliminary response to Section 104(e) requests (.5); review correspondence from Mr. McChesney re documents concerning historical operations at Seattle facility (.8); strategy conference re preparation of draft response to EPA (.5); review and revise draft response to Section 104(e) requests (.8)
06/16/10		0.2		Strategy conference re responses to Section 104(e) information requests (.2)
06/16/10		1.2		Review and analyze EPA Section 104(e) request in preparation for response (1.2)
06/17/10		0.5		Conference with Fidelity National Title re chain of title report (.1); review chain of title guarantee (.4)
06/17/10		2.8		Review and revise draft response to Section 104(e) request (2.5); strategy conference re preparation of Section 104(e) request (.3)
06/17/10		2.3		Review and analyze KGC documents in preparation for response to EPA Section 104(e) request (.6); prepare responses to EPA Section 104(e) request (1.7)
06/18/10		1.5		Review and revise draft response to Section 104(e) request (1.5)
06/18/10		0.2		Correspondence with King County GIS staff re internet mapping tool (.2)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 3

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number (b) (6)

Three Rivers Management, Inc. 039391.0006 July 30, 2010

<u>Date</u>	Professional	<u>Time</u>	Amount	<u>Description of Services</u>
06/21/10	(b) (6)	0.3	(b) (6)	Review property description (.1); order chain of title guarantee from Fidelity National Title (.2)
06/21/10		2.5		Prepare draft response to Section 104(e) requests (2.1); strategy conference re review of documents and title information in preparation of response to Section 104(e) requests (.4)
06/21/10		1.3		Revise responses to EPA Section 104(e) request in preparation for client review (1.3)
06/22/10		1.4		Review correspondence from Mr. McChesney re revisions to KGC's draft response to Section 104(e) requests (.8); strategy conference re preparation of documents for submittal with Section 104(e) response (.5); prepare correspondence to Mr. McChesney re certification requested by EPA (.1)
06/22/10		1.1		Prepare client documents in preparation for production to EPA (1.1)
06/23/10		2.7		Review and respond to correspondence from Mr. McChesney re revisions to Section 104(e) response (.6); revise Section 104(e) response (.7); prepare cover letter for Section 104(e) response (.8); strategy conference re submittal to EPA (.3); communication with Mr. McChesney re corporate financial information and revisions to cover letter and Section 104(e) response (.3)
06/23/10		3.3		Prepare letter for transmittal to Ms. Hong at the EPA (.6); continue to prepare documents in preparation for production to EPA (.7); prepare electronic versions of client document for production to EPA (.4); review, analyze and revise responses to EPA Section 104(e) request (1.6)
06/29/10		0.8		Review and analyze chain of title guarantee (.8)

Three Rivers Management, Inc. 039391.0006 July 30, 2010

#### Time Summary

Professional (b) (6)	<u>Time</u> 22.5	Rate (b) (6)	Amount
	2.4		
	2.0		
	9.2		
Summary Total:	36.1		\$8,633.00

#### **Disbursement Summary**

<u>Disbursements</u>	<u>Amount</u>
Photocopy expense	\$0.16
Chain of Title Guarantee for property: 5906 West Marginal Way	197.10
Southwest, Seattle, Washington 98106 by FNT Company of Washington	
Disbursement Total:	\$197.26

Total fees:

\$8,633.00

Total disbursements:

<u>\$197.26</u>

Total amount due:

\$8,830.26



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August 23, 2010

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel Manor Oak One, Suite 200 1910 Cochran Road Pittsburgh, PA 15220

For professional services through 07/31/10

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

Invoice No: 512989

<u>Date</u>	Professiona	<u>Time</u>	Amount	<b>Description of Services</b>
07/06/10	(b) (6)	0.1	(b) (6)	Strategy conference re chain of title guarantee and prepare correspondence to Fidelity National Title requesting additional deed history (.1)
07/07/10		0.3		Review vesting information (.2); prepare correspondence to Fidelity National Title requesting legal description (.1)
07/12/10		0.8		Review and analyze additional deed history and amended chain of title guarantee (.5); prepare correspondence to Fidelity National Title re parcel locations (.3)
07/13/10		2,2		Review and analyze chain of title guarantee and legal descriptions (1.8); conference with Mr. Sarver re and amend chain of title guarantee to include additional property (.4)
07/13/10		0.6		Review title report for additional property owned by Pacific Coast Cement Company on LDW (.4); strategy conference re title report (.2)
07/14/10		0.4		Prepare correspondence to Mr. McChesney re additional property owned by Pacific Coast Cement along LDW (.4)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number (b) (6)

Amount

Total amount due:

Three Rivers Management, Inc. 039391,0006 August 23, 2010

**Disbursements** 

<u>Date</u>	Professional	<u>Time</u>	Amount	<b>Description of Services</b>
07/28/10	(b) (6)	0.5	(b) (6)	Prepare correspondence to Mr. Sarver re chain of title report for Marginal Way surrounding property (.3); review chain of title guarantee (.3)
07/30/10		0.6		Review and analyze chain of title guarantee (.6)

#### **Time Summary**

(b) (6)	<u>Time</u> 1.0	Rate (b) (6)	Amount
	4.5		
Summary Total:	5.5		\$1,142.50

#### **Disbursement Summary**

File No. 100604696 Chain of Title Report from Fidelity National Title	109.50	
Disbursement Total:	\$109.50	
	Total fees:	\$1,142.50
Total d	isbursements:	\$109.50

If you have any questions regarding this invoice, please contact Steve Hill's assistant at 360-699-4771.

\$1,252.00



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Invoice No: 514771

September 22, 2010

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 08/31/10

Account: 039391.0006

Three Rivers Management, Inc.

Lower Duwamish Waterway - Kaiser Gypsum Company, Inc.

<u>Date</u>	<b>Professional</b>	Time	Amount	<u>Description of Services</u>
08/02/10	(b) (6)	1.3	(b) (6)	Strategy conference re property locations and environmental report (.2); continue to review and analyze chain of title guarantee (1.1) (No Charge)
08/02/10		0.4		Review final RI report (.1); prepare correspondence to Mr. McChesney re review of final RI report (.1); strategy conference re identification of additional KGC property on LDW (.2)
08/03/10		1.2		Analyze chain of title guarantee (1.2)
08/03/10		0.2		Review and respond to correspondence from Mr. McChesney re review of final RI report (.2)
08/05/10		2.5		Communications with Mr. Sarver re plat maps (.4); analyze deeds and identify property on plat maps (2.1)
08/05/10		0.2		Strategy conference re request to title company for new maps showing property owned by Pacific Coast Cement (.2) (No Charge)
08/06/10		2.9		Continue to analyze deed history and track conveyances and identify location of properties (2.9)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received one the ctatement date. Employer Identification Number (b) (6)

Three Rivers Management, Inc. 039391.0006 September 22, 2010

<u>Date</u>	Professional	Time	Amount	Description of Services
08/06/10	(b) (6)	0.3	(b) (6)	Strategy conference re title records of additional waterfront property owned by Pacific Coast Cement (.3) (No Charge)
08/09/10		1.7		Continue to analyze title history (1.7)
08/11/10		2.4		Continue to analyze title history (2.4)
08/12/10		2.7		Continue to analyze title history and prepare history chart and map parcels (2.7)
08/13/10		1.0		Continue to review, analyze, and prepare title history chart and map parcels (1.0)
08/13/10		1.8		Review title documents showing prior ownership of waterfront property on LDW by Pacific Coast Cement Company (.8); strategy conference re prior ownership of waterfront property (.6); review and revise table showing prior ownership (.4)
08/16/10		1.8		Prepare memorandum re new property along LDW owned by Pacific Coast Cement (1.5); review and revise table showing new title documents (.3)
08/17/10		0.2		Communication with Mr. McChesney re memorandum concerning additional property owned by Pacific Coast Cement (.2)
08/18/10		0.2		Strategy conference re deed history (.2) (No Charge)
08/18/10		<b>0.</b> 4		Revise memorandum re new property along LDW formerly owned by Pacific Coast Cement Company (.4)
08/27/10		1.5		Finalize memorandum re additional properties owned by Pacific Coast Cement (1.1); prepare correspondence to Mr. McChesney re memorandum (.4)

# **Time Summary**

Professional (b) (6)	<u>Time</u> 6.8	Rate (b) (6)	Amount
	15.9		
Summary Total:	22.7		\$5,049.50

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

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This statement may not include expense items for which we have not yet been billed, or payments received after the statement date.  $Employer\ Identification\ Number(b)\ (6)$  Three Rivers Management, Inc. 039391.0006 September 22, 2010

**Disbursements** 

#### **Disbursement Summary**

Photocopy expense	\$1.44	
Disbursement Total:	\$1.44	
	Total foor	\$5,049.50
	Total fees:	\$5,0 <del>4</del> 9.50
	Less reduction in fees:	<u>-\$432.50</u>

Total adjusted fees: \$4,617.00

Total disbursements: \$1.44

**Amount** 

**Total amount due:** \$4,618.44



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Invoice No: 517821

November 29, 2010

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 10/31/10

Account: 039391.0006

Three Rivers Management, Inc.

Lower Duwamish Waterway - Kaiser Gypsum Company, Inc.

Date	Profession	<u>al</u> <u>Time</u>	Amount	<b>Description of Services</b>
10/04/10	(b) (6)	0,6	(b) (6)	Research law re duty to defend case (.2); review status of responses to EPA information request (.2); prepare correspondence to Mr. McChesney re new case triggering duty to defend and status of review of documents (.2)
10/07/10		0.4		Prepare for and participate in conference call with Mr. McChesney re strategy for document review (.4)
10/20/10		0.4		Communication with Ms. Hong at EPA re status of supplemental response to Section 104(e) requests (.3); communication with Mr. McChesney re communication from EPA (.1)
10/27/10		0.4		Research law re revised feasibility study for LDW (.3); strategy conference re corporate history (.1)
10/28/10		0.2		Prepare correspondence to Mr. McChesney re public review and comment on revised feasibility study for LDW superfund site (.2)

Three Rivers Management, Inc. 039391.0006 November 29, 2010

<u>Date</u>	Professional	<u>Time</u>	Amount	<u>Description of Services</u>
10/29/10	(b) (6)	0.8	(b) (6)	Communication with Mr. McChesney re plan for document review and response to EPA (.5); prepare correspondence to Ms. Hong at EPA re status of submittal of supplemental response to Section 104(e) request (.3)

#### Time Summary

Professional	<u>Time</u>	Rate	<u>Amount</u>
(b) (6)	2.8	(b)	(b) (6)
Summary Total:	2.8		\$868.00

#### **Disbursement Summary**

Additional work charge re property: 3801 East Margina Washington, 98134 by FNT Company of Washington	al Way, Seattle, Amount 142.35		
Disbursement Total:	\$142.35		
	Total fees:	\$868.00	
	Total disbursements:	\$142.35	
<b>'</b> w	Total amount due	\$1,010,35	



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December 29, 2010

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel Manor Oak One, Suite 200 1910 Cochran Road Pittsburgh, PA 15220

For professional services through 11/30/10

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

Invoice No: 520543

<u>Date</u>	Professional	<u>Time</u>	Amount	<b>Description of Services</b>
11/01/10	(b) (6)	0.4	(b) (6)	Review correspondence from Mr. McChesney re document indices (.3); strategy conference re processing for reviewing indices for storage of documents (.1)
11/01/10		0.8		Strategy conference re review of indices (.2); review and analyze response to EPA (.6) (No Charge)
11/02/10		1.1		Communication with Mr. McChesney re communications with EPA and strategy for review of indexes and documents (.2); strategy conference re protocols for reviewing indexes and documents for supplemental response to Section 104(e) requests (.9)
11/02/10		1.5		Strategy conference re client document retrieval (.7); review client files re documents responsive to EPA investigation (.8)
11/02/10		2.7		Continue to review and analyze response to EPA (.5); prepare summary based on response to EPA for use in document review (.8); strategy conference re

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approach to analysis of document index and document review (.7); review and analyze document index (.7)

Three Rivers Management, Inc. 039391.0006 December 29, 2010

Date	<b>Professional</b>	<u>Time</u>	Amount	Description of Services
11/03/10	(b) (6)	1.7	(b) (6)	Continue to review and analyze client indices (.7); research client documents and Internet for common names of plant and client subsidiaries (1.0)
11/04/10		0.4		Continue to review and analyze (.2) and strategy conference (.2) re historical information on Kaiser in connection with review of indices of boxes stored at facility in Oakland, California
11/05/10		1.8		Continue to review client files re documents responsive to EPA investigation (1.8)
11/05/10		1.8 .		Continue to review and analyze indices, review client documents, and Kaiser history (1.1); prepare memorandum summarizing analysis of files indices (.7)
11/08/10		0.3		Strategy conference re status of review of indexes of boxed documents (.3) (No Charge)
11/08/10		2.7		Strategy conference re status of file indices review and research (.5); continue to review and research historical company information and analyze indices (1.0); prepare memorandum to Mr. Hill re indices analysis (1.2)
11/09/10		1.2		Review memorandum re (.6) and strategy conference re (.2) analysis of indexes of boxes of corporate documents; review product bulletins re relevance for Section 104(e) supplemental response (.4)
11/10/10		0.3		Continue to review memorandum re box indexes for relevancy to Section 104(e) requests (.3) (No Charge)
11/11/10		0.7		Strategy conference re review of box indices and recommendation for initial boxes for review (.4); prepare correspondence to Mr. McChesney re review of box indices (.1); review and revise memorandum re box indices and recommendations for document review (.2)
11/11/10		0.2		Review memorandum re box retrieval from Iron Mountain for document review (.2)
11/11/10		1.2		Strategy conference re analysis of file indices (.5); revise memorandum re indices analysis (.7)

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Three Rivers Management, Inc. 039391,0006 December 29, 2010

<u>Date</u>	Professional	<u>Time</u>	Amount	Description of Services
11/12/10	(b) (6)	0.9	(b) (6)	Prepare for and participate in conference call with Mr. McChesney re strategy for selection of boxes to review (.5); review correspondence from Mr. McChesney re getting access to boxes in California warehouse (.1); strategy conference re review of corporate documents (.3)
11/12/10		0.2		Strategy conference with Mr. Hill and Ms. Morton re next steps (.2) (No Charge)
11/15/10		0.2		Review and revise draft correspondence to Mr. McChesney re (.1) and strategy conference re (.1) procedure for obtaining boxes of documents from California warehouse
11/15/10		0.3		Prepare file box table (.2); correspondence with Mr. McChesney re file box tables in Word and Excel format and contact information for box delivery (.1)
11/16/10		0.1		Communication with Mr. McChesney re process for obtaining boxes of documents (.1) (No Charge)
11/18/10		0.2		Review, analyze, and prepare summary of product ingredients used at the Lower Duwamish Sites (.2)
11/18/10		0.1		Strategy conference re obtaining boxes of documents from California warehouse (.1) (No Charge)
11/18/10		1.4		Review and analyze Kaiser Gypsum Product Bulletins and compile list of products and raw materials (1.4)
11/19/10		0.1		Continue to review, analyze, and prepare summary of product ingredients used at Lower Duwamish Sites (.1)
11/19/10		0.2		Communications with Iron Mountain and correspondence with Ms. Schindele re issues with box shipment (.2)
11/22/10		2.7		Continue to review and analyze Kaiser Gypsum Product Bulletins and compile list of products and raw materials (2.7)
11/22/10		0.2		Review documents re historical Seattle operations (.2)
11/22/10		0.1	::	Receive box shipment from Iron Mountain, briefly review, and correspondence with Mr. Schindle re box

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shipment (.1)

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Employer Identification Number (b) (6)

KG2004581

Three Rivers Management, Inc. 039391.0006 December 29, 2010

Date	Professional	<u>Time</u>	<u>Amount</u>	Description of Services
11/23/10	(b) (6)	2.6	(b) (6)	Continue to review and analyze Kaiser Gypsum Product Bulletins and compile list of products and raw materials (2.6)
11/23/10		0.3		Strategy conference re review of boxes of documents from California warehouses and list of ingredients from product bulletins (.3)
11/23/10		0.3		Receive shipment of 57 boxes and coordinate verification of boxes received and review ingredient list compiled from review of 750 product bulletins (.3)
11/24/10		0.6		Review box shipment for verification of boxes received (.6)
11/24/10		0.6		Strategy conference re preliminary review of documents concerning Seattle operations (.3); review documents re historical operations at Seattle facilities (.3) (No Charge)
11/24/10		0.7		Review and analyze client documents re documents responsive to EPA investigation (.7)
11/24/10		0.7		Review and analyze files for documents relevant to EPA investigation (.7)
11/29/10		0.8		Strategy conference re update on document review and strategy for identifying relevant documents for Section 104(e) response (.8)
11/29/10		2.9		Review and analyze client documents re documents responsive to EPA investigation (2.9)
11/29/10		2.3		Continue to review and analyze client files for documents relevant to EPA investigation (2.3)
11/30/10		0.8		Strategy conference re status of document review (.4); review documents re supplemental response to Section 104(e) request (.4)
11/30/10		1.8		Prepare detailed summaries of client documents responsive to EPA investigation for attorney review (1.8)
11/30/10		0.8		Strategy conferences re box summaries (.3) and re box review (.2); prepare Mr. Hill for meeting with client (.3)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

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Employer Identification Number (b) (6)

Three Rivers Management, Inc. 039391,0006 December 29, 2010

#### **Time Summary**

Professional	<u>Time</u>	Rate	Amount
S. Hill, Partner	8.0	\$310	\$2,480.00
L. Peterson, Paralegal	16.2	160	2,592.00
K. Cooley, Project Assistant	6.2	85	527.00
J. Morton, Paralegal	10.3	80	824.00
Summary Total:	40.7		\$6,423.00

Total fees:

\$6,423.00

Less reduction in fees:

-\$594.00

Total adjusted fees:

\$5,829.00

Total amount due:

\$5,829.00



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Invoice No: 522027

January 26, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 12/31/10

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	Professional	<u>Time</u> A	<u> mount</u>	<b>Description of Services</b>
12/01/10	(b) (6)	0.2	(b) (6)	Strategy conference re continued review of documents for supplemental Section 104(e) information response (.2) (No Charge)
12/03/10		0.3		Strategy conference re document review progress (.2); prepare correspondence to Mr. McChesney re new information on remediation options for LDW (.1)
12/15/10		0.6		Complete file conversion of aerial images for attorney review (.6) (No Charge)
12/23/10		0.2		Strategy conference re continued document review and preparing supplemental response to EPA Section 104(e) request (.2)
12/23/10		0.7		Strategy conference re document review (.7)
12/29/10		0.3		Review information for inclusion in document hub for LDW site (.3)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

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Three Rivers Management, Inc. 039391,0006 January 26, 2011

#### Time Summary

Professional (b) (6)	Time 1.0	Rate (b) (6)	Amount
	0.7		
	0.6		
Summary Total:	2.3	LINGUITA	\$473.00

Total fees:

\$473.00

Less reduction in fees:

-<u>\$113.00</u>

Total adjusted fees:

\$360.00

Total amount due:

\$360.00



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Invoice No: 523895

February 24, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 01/31/11

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	<b>Professional</b>		Amount	<u>Description of Services</u>
01/03/11	(b) (6)	0.1	(b) (6)	Review article on status of cleanup options for LDW (.1) (No Charge)
01/03/11		0.2		Strategy conference re review of KGC product bulletins to identify products produced (.2)
01/04/11		0.3		Communication with Mr. McChesney re (.1) and strategy conference re (.2) status of review of historical documents
01/04/11		0.2		Strategy conferences re document review (.1) and re status of document review (.1)
01/07/11		2.6		Review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (2.6)
01/07/11		0.4		Review (.2) and strategy conference re (.2) feasibility study for LDW
01/07/11		0.2		Strategy conference re submission of comment letter to EPA regarding draft LDW feasibility study (.2) (No Charge)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number (b)

Three Rivers Management, Inc. 039391.0006 February 24, 2011

<u>Date</u>	Professional	<u>Time</u>	Amount	Description of Services
01/10/11	(b) (6)	1.9	(b) (6)	Continue to review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (1.9)
01/10/11		0.2		Strategy conference re LDW feasibility study (.2) (No Charge)
01/10/11		0.6		Review draft final feasibility study (.6)
01/11/11		0.4		Review (.2) and strategy conference re comments on (.2) LDW feasibility study
01/11/11		0.2		Continue to review feasibility study (.2)
01/12/11		0.9		Prepare for and participate in conference call re LDW feasibility study (.4); review LDW feasibility study re implications for former KGC site (.3); strategy conference re review of LDW feasibility study (.2)
01/12/11		1.0		Prepare for and participate in conference call re proposed comment letter to EPA and DOE regarding draft LDW feasibility study (.3); continue to review draft feasibility study (.5); begin to prepare draft
				comment letter (.2)
01/13/11		0.5		Review LDW feasibility study re implications for liability from historical operations (.5)
01/13/11		0.8		Continue to prepare comment letter to EPA and Ecology re draft final feasibility study (.8)
01/14/11		0.4		Prepare correspondence to Mr. McChesney re status of document review and discovery of internal memorandum concerning wastewater discharges from early 1970s (.2); strategy conference re update on document review progress (.2)
01/14/11		0.5		Continue to review and analyze client files for documents relevant to EPA investigation (.5)
01/18/11		0.3		Communication with Mr. McChesney re status of document review for supplemental response to EPA Section 104(e) request (.1); strategy conference re additional documents of interest (.2)
01/18/11		0.5		Continue to review and analyze client files for documents relevant to EPA investigation (.5)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent...per month (9 percent annually).

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This statement may not include expense items for which we have not yet been billed, or payments rece (b) (6) statement date.

Employer Identification Number (KG2004587)

Three Rivers Management, Inc. 039391.0006 February 24, 2011

<u>Date</u>	Professional	<u>Time</u>	Amount	<u>Description of Services</u>
01/19/11	(b) (6)	0.8	(b) (6)	Continue to review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (.8)
01/19/11		0.3		Strategy conference re review of documents referencing historical pollution control activities at Seattle facility (.3)
01/19/11		1.5		Continue to review and analyze client files for documents relevant to EPA investigation (1.5)
01/20/11		2.0		Continue to review and analyze client files for documents relevant to EPA investigation (2.0)
01/21/11		0.4		Strategy conference re review of historical documents (.4)
01/21/11		2.5		Continue to review and analyze client files for documents relevant to EPA investigation (2.5)
01/24/11		0.4		Strategy conference re status of document review (.4)
01/24/11		1.1		Continue to review and analyze client documents for documents responsive to EPA investigation (.9); strategy conference re status of document review (.2)
01/25/11		0.5		Strategy conference re historical documents concerning operations at gypsum facility in Seattle (.5)
01/25/11		1.1		Review and analyze client documents re documents responsive to EPA investigation (3.1)
01/25/11		2.4		Begin development of historical timeline (.1); continue to review and analyze client files for documents relevant to EPA investigation (2.0); conferences with Mr. Hill re corporate history (.3)
01/26/11		1.1		Review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (.1)
01/26/11		0.4		Strategy conference re documents describing operations history at Seattle gypsum facility (.4)
01/26/11		0.5		Continue to review and analyze client documents redocuments responsive to EPA investigation (2.0)

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Three Rivers Management, Inc. 039391.0006 February 24, 2011

Date	Professional	Time	Amount	Description of Services
<u> </u>			(b) (6)	and the state of t
01/26/11	(b) (6)	1.3		Strategy conferences re development of timeline (.1) and re status of document review (.1); continue to review and analyze client files for documents relevant to EPA investigation (1.1)
01/27/11		2.8		Continue to review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (2.8)
01/27/11		0.3		Strategy conference re review of historical documents on Seattle facility (.3) (No Charge)
01/27/11		0.1		Prepare detailed descriptions of box contents for inclusion into spreadsheet (.3)
01/27/11		2.7		Strategy conference re document review (.1); continue to review and analyze client files for documents relevant to EPA investigation (2.6)
01/28/11		0.4		Strategy conference re review of historical documents concerning ownership and operation of Seattle gypsum facility (.4)
01/28/11		0.4		Continue to review and analyze client documents re documents responsive to EPA investigation (.4)
01/31/11		0.5		Strategy conference re status of historical document review and strategy for preparing supplemental response to EPA (.5)

# Time Summary

Professional	<u>Time</u>	Rate	<u>Amount</u>
(b) (6)	6.7	(b) (6)	
	2.8		
	14.9		
	2.1		
	9.2		
Summary Total:	35.7		\$6,481.00

Three Rivers Management, Inc. 039391.0006 February 24, 2011

Total fees:

\$6,481.00

Less reduction in fees:

-\$254.00

Total adjusted fees:

\$6,227.00

Total amount due:

\$6,227.00



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Invoice No: 525967

March 31, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 02/28/11

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	<b>Professional</b>	<u>Time</u>	<u>Amount</u>	Description of Services
02/01/11	(b) (6)	0.2	(b) (6)	Strategy conference re copying relevant documents and preparing supplemental Section 104(e) response (.2) (No Charge)
02/01/11		0.8		Correspondence and telephone conversations with three vendors re request for proposal for scanning and Bates numbering client documents (.5); conference with representatives of IKON (.2); conference with representative of BridgeCity (.1)
02/02/11		0.3		Review scanning proposal from BridgeCity and discuss with Mr. Hill (.1); conference with Mr. Northrup of Streamline re document scanning (.2)
02/03/11		0.5		Strategy conference re status of document review and process for organizing historical information on Seattle facility (.5) (No Charge)
02/04/11		0.7		Communication with Mr. McChesney re status of document review and preparation of supplemental response to EPA (.4); strategy conference re
				preparation of database for historical information discovered during document review (.3)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received ofter the elatement date. Employer Identification Number (b) (6)

Three Rivers Management, Inc. 039391.0006 March 31, 2011

<u>Date</u>	<b>Professional</b>	<u>Time</u>	Amount	<u>Description of Services</u>
02/04/11	(b) (6)	0.6	(b) (6)	Strategy conference re meeting with Mr. McChesney and proceeding with scanning of document (.2); prepare notes (.1); telephone conference with Mr.
				Northrup of Streamline to finalize bid (.3)
02/07/11		0.2		Strategy conference re document review status (.2) (No Charge)
02/07/11		1.0		Continue to review and analyze client files for documents relevant to EPA investigation and finalize preparation of first 16 boxes for scanning (1.0)
02/08/11		0.6		Conference with Mr. Northrup of Streamline re processing of documents, creation of databases, and pickup of first 16 boxes of documents for scanning (.6)
02/14/11		0.5		Review information re status of LDW RI/FS and next steps in cleanup of LDW (.5) $$
02/14/11		0.9		Review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (.9)
02/15/11		1.2		Continue to review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (1.2)
02/15/11		0.5		Review article describing history of industrial activity on LDW (.3); strategy conference re review of new information on index of boxes in California warehouse and selection of new boxes to review (.2)
02/15/11		0.8		Continue to review and analyze client documents for documents relevant to EPA investigation (.8)
02/16/11		1.5		Continue to review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (1.5)
02/16/11		0.2		Continue to review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (.2)

Three Rivers Management, Inc. 039391.0006 March 31, 2011

<u>Date</u>	Professional	<u>Time</u>	Amount	Description of Services
02/17/11	(b) (6)	0.2	(b) (6)	Review Boise Cascade consent order re LDW natural resource damages settlement agreement (.2) (No Charge)
02/17/11		1.1		Continue to review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (1.1)
02/18/11		1.8		Continue to review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (1.8)
02/18/11		2.4		Continue to review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (2.4)
02/22/11		0.7		Continue to review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (.2); prepare client documents for inclusion into Summation database (.5)
02/22/11		0.2		Conference with Mr. Northrup of Streamline re processing of documents (.2)
02/23/11		3,1		Continue to review and analyze Kaiser Gypsum product bulletins for produced product and create spreadsheet (3.1)
02/23/11		1.2		Continue to review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (1.2)
02/24/11		1.1		Continue to review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (1.1)
02/25/11		0.8		Continue to review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (.8)
02/28/11		0.4		Strategy conference re status of document review and request for additional boxes from repository (.4)

Three Rivers Management, Inc. 039391.0006 March 31, 2011

<u>Date</u>	Professional	<u>Time</u>	Amount	<u>Description of Services</u>
02/28/11	(b) (6)	0.9	(b) (6)	Continue to review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (.9)

#### **Time Summary**

Professional (b) (6)	<u>Time</u> 3.2	<u>Rate</u> (b) (6)	Amount
	12.9		
	8.3		
Summary Total:	24.4		\$3,922.00

Total fees:

\$3,922.00

Less reduction in fees:

-\$374.00

Total adjusted fees:

\$3,548.00

Total amount due:

\$3,548.00



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April 29, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel Manor Oak One, Suite 200 1910 Cochran Road Pittsburgh, PA 15220

For professional services through 03/31/11

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

Invoice No: 527736

<u>Date</u>	<b>Professional</b>	<u>Time</u>	<u>Amount</u>	<b>Description of Services</b>
03/01/11	(b) (6)	0.3	(b) (6)	Strategy conference re status of document review and selection of additional boxes for review (.3) (No Charge)
. 03/01/11		2.6		Continue to review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (2.3); strategy conference re index review (.3)
03/02/11		3.3		Continue to review and analyze client CD of pop the top indexes and records transfer request forms to identify boxes containing documents possibly relevant to EPA investigation (3.3)
03/03/11		0.2		Strategy conference re additional boxes for review (.2) (No Charge)
03/03/11		0.3		Correspondence with Ms. Schindele to coordinate retrieval of additional client documents from Iron Mountain for review and return to Iron Mountain of boxes recently reviewed (.3)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number  $\binom{b}{6}$ 

Three Rivers Management, Inc. 039391.0006 April 29, 2011

<u>Date</u>	Professional	<u>Time</u>	Amount	Description of Services
03/08/11	(b) (6)	0.5	(b) (6)	Prepare correspondence to Mr. McChesney re status of document review (.2); review documents in Summation database (.3)
03/10/11		0.4		Review documents re historical operations at gypsum facility in Seattle (.2); strategy conference re new documents to be reviewed (.2)
03/10/11		0.7		Strategy conference re strategy for continued review of client documents (.1); coordinate inventory of box shipment containing client documents received March 9, 2011 and update of spreadsheet (.3); correspondence with Ms. Schindle to confirm return
				of certain boxes by pickup from Iron Mountain and receipt of certain boxes by FedEx (.3)
03/11/11		0.5		Begin review of documents retrieved from repository (.5)
03/14/11		1.8		Review historical documents re operations at Seattle gypsum plant (1.4); strategy conference re additional documents to review concerning historical operations at Seattle gypsum facility (.4)
03/14/11		2.0		Strategy conference re Kaiser Gypsum product bulletins and materials list, and re analysis of documents in Summation database (.3); review, analyze, and revise product bulletin summary and materials list (1.5); strategy conference re summary and list (.2)
03/15/11		1.5		Review and revise list of product bulletins and raw materials used at Seattle gypsum facility (1.1); prepare correspondence to Mr. McChesney re list of materials used at Seattle gypsum facility (.4)
03/15/11		0.2		Strategy conference re product bulletin summary (.1); revise product bulletin summary (.1) (No Charge)
03/16/11		1.6		Begin to prepare Kaiser Gypsum product bulletins for inclusion into Summation database (1.6)
03/16/11		0.8		Review and analyze records indices re documents responsive to EPA request (.8)
03/17/11		1.9		Continue to prepare Kaiser Gypsum product bulletins for inclusion into Summation database (1.9)

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Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number (b) (6)

Three Rivers Management, Inc. 039391.0006 April 29, 2011

Date	<u>Professional</u>	Time	Amount	Description of Services
03/18/11	(b) (6)	4.2	(b) (6)	Continue to prepare Kaiser Gypsum product bulletins for inclusion into Summation database (4.2)
03/21/11		2.2		Continue to prepare Kaiser Gypsum product bulletins for inclusion into Summation database (2.2) (No Charge)
03/22/11		1.3		Continue to prepare Kaiser Gypsum product bulletins for inclusion into Summation database (1.3) (No Charge)
03/22/11		0.9		Communication with Mr. McChesney re status of document review and next steps for reviewing historical information (.4); strategy conference re communication with counsel concerning review of records transfer forms (.5)
03/23/11		1.0		Review revised raw materials list re historical operations at Seattle gypsum plant (.5); prepare correspondence to Mr. McChesney re revised raw materials list (.5)
03/23/11		0.7		Review and analyze (.6) and strategy conference re (.1)materials list for products versus chemical names
03/25/11		1.8		Continue to prepare Kaiser Gypsum Product Bulletins for inclusion into Summation database (No Charge)
03/28/11		2.5		Continue to prepare Kaiser Gypsum Product Bulletins for inclusion into Summation database (2.5) (No Charge)
03/28/11		0.3		Strategy conference re status of review of new boxes of historical documents and process for selecting additional boxes to review (.3) (No Charge)
03/28/11		0.7		Review and analyze EPA Section 104(e) request and correspondence from Mr. Hill to Ms. Hong re KGC's Section 104(e) response (.7)

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Three Rivers Management, Inc. 039391.0006 April 29, 2011

#### Time Summary

(b) (6)	<u>Time</u> 7.4	<u>Rate</u> (b) (6)	Amount
	10.5		
	0.8		
	15.5		
Summary Total:	34.2		\$5,666.00

### **Disbursement Summary**

<u>Disbursements</u>	Amount
Document production charges by Streamline Imaging	209.35
Disbursement Total:	\$209.35

Total fees: \$5,666.00

Less reduction in fees: -\frac{\$968.00}{\$4,698.00}

Total adjusted fees: \$4,698.00

Total disbursements: \frac{\$209.35}{\$4,907.35}



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Invoice No: 529629

May 31, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 04/30/11

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	<b>Professional</b>	<u>Time</u>	Amount	<b>Description of Services</b>
04/08/11	(b) (6)	0.7	(b) (6)	Prepare documents for inclusion into Summation database (.7) (No Charge)
04/08/11		0.9		Continue to review and analyze client files for documents responsive to EPA investigation (.9)
04/13/11		0.3		Strategy conference re status of review of historical documents concerning operations on LDW (.3) (No Charge)
04/14/11		2.8		Continue to review and analyze client files for documents responsive to EPA investigation (2.8)
04/21/11		0.6		Prepare Summation database summaries for documents potentially relevant to EPA response (.6) (No Charge)
04/21/11		1.0		Continue to review and analyze client files for documents responsive to EPA investigation (1.0)
04/22/11		0.3		Strategy conference re ongoing review of historical

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received (b) (6) statement date.

documents (.3) (No Charge)

Three Rivers Management, Inc. 039391,0006 May 31, 2011

Date	Professional	<u>Time</u>	Amount	Description of Services
04/25/11	(b) (6)	0.2	(b) (6)	Prepare Summation database summaries for documents potentially relevant to EPA response (.2) (No Charge)
04/25/11		0.4		Strategy conference re continued review of historical documents on Duwamish Waterway facilities (.4)
04/26/11		0.2		Strategy conference re review of historical documents (.2) (No Charge)
04/27/11		0.2		Strategy conference re discovery of documents showing historic documents describing construction of gypsum facility (.2) (No Charge)
04/28/11		0.2		Prepare Summation database summaries for documents potentially relevant to EPA response (.2) (No Charge)

#### **Time Summary**

Professional	Time	Rate	<u>Amount</u>
(b) (6)	1.4	(b) (6)	
	4.7		
	1.7		
Summary Total:	7.8		\$1,396.00

**Total fees:** \$1,396.00

Less reduction in fees: -\$484.50

Total adjusted fees: \$911.50

Total amount due: \$911.50



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Invoice No: 530343

June 28, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 05/31/11

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	Professional	<u>Time</u>	<b>Amount</b>	<b>Description of Services</b>
05/03/11	(b) (6)	0.1 .	(b) (6)	Strategy conference re status of historical document review (.1) (No Charge - \$34.00)
05/06/11		0.3		Strategy conference re review of historical documents concerning LDW facilities (.3) (No Charge - \$102.00)
05/06/11		1.0		Continue to review and analyze client files for documents responsive to EPA investigation (1.0)
05/11/11		0.5		Strategy conference re discovery of additional plant inventory and other historical documents relevant to Section 104(e) information requests (.5)
05/11/11		3.3		Continue to review and analyze client files for documents responsive to EPA investigation (3.0); strategy conference re analysis of AFE expenses for capital improvements on gypsum site (.3)
05/12/11		0.3		Communication with Mr. Alexander of EPA re request for response concerning status of document review and submittal of supplemental Section 104(e) responses (.2); strategy conference re status of document review (.1)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Numbe(b) (6)

Three Rivers Management, Inc. 039391.0006 June 28, 2011

<u>Date</u>	Professional	Time	Amount	Description of Services
05/12/11	(b) (6)	1.5	(b) (6)	Review and analyze client documents redocuments responsive to EPA request (1.5)
05/12/11		4.3		Continue to review and analyze client files for documents responsive to EPA investigation (4.3)
05/13/11		0.4		Prepare correspondence to Mr. McChesney re communication with EPA concerning status of supplemental Section 104(e) response (.2), and to Mr. Fidis at EPA re status of KGC's supplemental Section 104(e) response (.2)
05/16/11		0.5		Strategy conference re additional documents re environmental improvements at Seattle gypsum facility (.5)
05/16/11		2.4		Continue to review and analyze client files for documents responsive to EPA investigation (2.4)
05/17/11		1.5		Continue to review and analyze client files for documents responsive to EPA investigation (1.0); prepare boxes for pick up by Streamline (.5)
05/18/11		0,3		Strategy conference re request for new boxes of documents and relevancy of historic drawings and maps (.3) (No Charge - \$102.00)
05/18/11		0.8		File organization (.2); correspondence with Iron Mountain and Mr. McChesney re return of client files to storage and status of boxes requested but not yet received (.6)
05/19/11		0.2		Communication and correspondence with client representatives re Iron Mountain issues (.2)
05/20/11		0.1		Conference with Mr. Northrup of Streamline re document scanning (.1)
05/25/11		0.1		Strategy conference re status of review of boxes of historical documents and request for additional boxes (.1) (No Charge - \$34.00)
05/25/11		0.8		Correspondence with Ms. Whigham re Iron Mountain access (.2); set up Iron Mountain account and correspondence with Iron Mountain Customer Service re request for box retrieval and return (.4); order boxes from Iron Mountain (.2)
	,			` '

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

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This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number (6) (6)

Three Rivers Management, Inc. 039391.0006 June 28, 2011

Date	Professional	<u>Time</u>	Amount	<b>Description of Services</b>
05/26/11	(p	0.1	(b)	Communications with Mr. Northrup of Streamline re questions of document scanning (.1)

### **Time Summary**

Professional (b) (6)	<u>Time</u> 2.5	Rate (b) (6)	<u>Amount</u>
	14.5		
	1.5		
Summary Total:	18,5		\$3,430.00

Total fees:

\$3,430.00

Less reduction in fees:

-\$272.00

Total adjusted fees:

\$3,158.00

Total amount due:

\$3,158.00



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Invoice No: 533282

July 29, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 06/30/11

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	<b>Professional</b>	<u>Time</u>	<u>Amount</u>	<u>Description of Services</u>
06/01/11	(b) (6)	1.9	(b) (6)	Continue to review and analyze client files for documents responsive to EPA investigation (1.9)
06/06/11		3.6		Continue to review and analyze pop-the-top box indices to identify boxes that may contain documents relevant to EPA investigation (3.6)
06/07/11		3.1		Continue to review and analyze pop-the-top box indices to identify boxes that may contain documents relevant to EPA investigation (3.1)
06/09/11		0.3		Strategy conference re status of review of box index re additional historical documents relevant to Section 104(e) request (.3) (No Charge)
06/09/11		1.2		Continue to review and analyze pop-the-top box indices to identify boxes that may contain documents relevant to EPA investigation (1.1); strategy conference re status (.1)
06/10/11		2.8		Continue to review and analyze pop-the-top box indices to identify boxes that may contain documents relevant to EPA investigation (2.8)

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number (b) (6)

Three Rivers Management, Inc. 039391.0006 July 29, 2011

<u>Date</u>	Professional	Time	Amount	Description of Services
06/13/11	(b) (6)	1.3	(b) (6)	Continue to review and analyze pop-the-top box indices to identify boxes that may contain documents relevant to EPA investigation (1.3)
06/14/11		0.6		Strategy conference re preparing document summaries for use in preparing Section 104(e) supplemental response (.6) (No Charge)
06/14/11		1.8		Strategy conference with Mr. Hill re document analysis and chronology preparation (.2); analyze box indices and prepare next order from Iron Mountain (1.2); conference with Mr. Rubenstein re document analysis and chronology preparation (.4)
06/15/11		0.3		Strategy conference re request for additional boxes of historical documents and preparation of supplemental response to EPA (.3) (No Charge)
06/15/11		0.5		Strategy conference re addressing additional issues re analysis of client documents and preparation of chronology (.5)
06/16/11		0.4		Strategy conference re review of historical documents and prepare supplemental response to Section 104(e) requests (.4) (No Charge)
06/22/11		0.2		Strategy conference re continuing review of historical documents (.2)

## Time Summary

<b>Professional</b>	<u>Time</u>	(b) (6)	Amount
(b) (6)	1.8	(2) (3)	
	16.2		
Summary Total:	18.0		\$3,285.00

## **Disbursement Summary**

<u>Disbursements</u>	Amount
Document production charges by Streamline Imaging	467.83
Disbursement Total:	\$467.83

Three Rivers Management, Inc. 039391.0006 July 29, 2011

Total fees:

\$3,285.00

Less reduction in fees:

\$-544.00

Total adjusted fees:

\$2,741.00

Total disbursements:

\$467.83

Total amount due:

\$3,208.83



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August 24, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 07/31/11

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

Invoice No: 534555

<u>Date</u>	<b>Professional</b>	<u>Time</u>	<u>Amount</u>	<b>Description of Services</b>
07/05/11	(b) (6)	2.1	(b) (6)	Continue to review and analyze CD of pop-the-top indices to identify boxes containing documents possibly relevant to EPA investigation (2.1)
07/13/11		0.3		Strategy conference re continued review of document indices re preparation of supplemental response to Section 104(e) request (.3) (No Charge)
07/18/11		0.7		Strategy conference re preparation of site chronology and organization of historical documents concerning site ownership and operations on LDW (.7)
07/18/11		0.6		Strategy conference re status of analysis of document review and preparation of site chronology (.6)
07/26/11		0.3		Strategy conference re status of document review and preparation of supplemental Section 104(e) response (.3) (No Charge)

Three Rivers Management, Inc. 039391,0006 August 24, 2011

#### Time Summary

Professional (b) (6)	<u>Time</u> 1.3	Rate (b) (6)	Amount
_	2.7		
Summary Total:	4.0		\$887.50

Total fees:

\$887.50

Less reduction in fees:

-\$204.00

Total adjusted fees:

\$683.50

Total amount due:

\$683.50



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September 27, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 08/31/11

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

Invoice No: 536219

<u>Date</u>	<b>Professional</b>	<u>Time</u>	<u>Amount</u>	Description of Services
08/05/11	(b) (6)	0.7	(b) (6)	Strategy conferences re status of review of boxes and documents for supplemental Section 104(e) response (.4); prepare correspondence to Mr. McChesney re status (.3)
08/05/11		0.2		Strategy conference re status of file review (.2)
08/08/11		2.9		Continue to review and analyze records transfer sheets (.8), and client files for documents responsive to EPA investigation (2.1)
08/09/11		0.3		Strategy conference re continued review of documents and strategy for preparing supplemental response to EPA Section 104(e) requests (.3) (No Charge)
08/10/11		2.3		Research Iron Mountain online document repository for box numbers associated with documents noted as having been located at Kincaid (.9); continue to review and analyze client files for documents

Accounts Due and Payable Upon Receipt. Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

Page 1

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Employer Identification Number

responsive to EPA investigation (1.4)

Three Rivers Management, Inc. 039391.0006 September 27, 2011

<u>Date</u>	Professional	<u>Time</u>	Amount	Description of Services
08/11/11	(b) (6)	0.4	(b) (6)	Strategy conference re preparation of document chronology and status of search for additional boxes of historical documents (.4) (No Charge)
08/11/11		1.0		Continue to review and analyze client files for documents responsive to EPA investigation (1.0)
08/12/11		0.6		Review list of boxes of documents that were not located at Iron Mountain (.3); strategy conference re finalizing the list of available documents for supplemental response to EPA information request (.3)
08/12/11		2.8		Continued analysis of and strategy conference re records center sheets re files "at Kincaid" (.3); continue to review and analyze client files for documents relevant to EPA investigation (2.5)
08/15/11		3.0		Continue to review and analyze client files for documents relevant to EPA investigation (3.0)
08/16/11		2.0		Continue to review and analyze client files for documents responsive to EPA investigation (2.0)
08/17/11		1.0		Continue to review and analyze client files for documents responsive to EPA investigation (1.0)
08/18/11		0.1		Strategy conference re status of review of remaining boxes for supplemental response to EPA Section 104(e) requests (.1) (No Charge)
08/18/11		0.1		Strategy conference re status of document review (.1)
08/19/11		0.9		Strategy conferences re status of review of documents and chronology prepared to assist with preparation of supplemental response to Section 104(e) requests (.9)
08/19/11		0.3		Strategy conference re status of document review in Summation and preparation of chronology (.3)
08/19/11		0.3		Strategy conference re Section 104(e) help needed (.3) (No Charge)

Three Rivers Management, Inc. 039391.0006 September 27, 2011

				•
<u>Date</u>	<u>Professional</u>	<u>Time</u>	Amount	<u>Description of Services</u>
08/22/11	(b) (6)	1.4	(b) (6)	Strategy conference re discovery of additional leased location for accessories plant on Duwamish waterway (.8); prepare correspondence to Mr. McChesney re current location for boxes checked out to Kincaid law firm in late 1980s (.4); review draft of document chronology (.2)
08/22/11		2.9		Continue to review and analyze client files for documents responsive to EPA investigation (2.9)
08/23/11		0.8		Strategy conference re discovery of new location on Duwamish waterway where KGC had an accessories plant (.8)
08/23/11		0.8		Further research re Seattle accessories plant (.2); strategy conference re Seattle accessories plant and sale to Pro-Line Products, Inc. (.2); review legal description attached to 1969 lease between Farrells and Lencis and KGC for accessories plant property and research re King County Assessor's office and GIS re property (.3); conference with Ms. Folkers re same (.1)
08/23/11		2.3		Continue to review and analyze client files for documents relevant to EPA investigation (2.3)
08/23/11		1.7		Strategy conference re project review and status (.8); begin to review former response to production (.9) (No Charge)
08/24/11		1.2		Strategy conference re (.8) and prepare correspondence to Mr. McChesney re (.4) discovery of new location leased by KGC for accessories plant
08/24/11		1.0		Review correspondence from Ms. Savage at First American Title re identification of property on which accessories plant was located (.2); further research on King County Assessor's Web site re property (.3); review previous property research re KGC property in Seattle (.2); strategy conference re accessories plant property (.3)
08/24/11		3.3		Continue to review and analyze client files for documents responsive to EPA investigation (3.3)
08/24/11		2.0		Continue to review documents for KGC (2.0)
		_		

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This statement may not include expense items for which we have not yet been billed, or payments recc(b) (6) tatement date.

Employer Identification Number

Three Rivers Management, Inc. 039391.0006 September 27, 2011

Date	Professiona	<u>l</u> <u>Time</u>	Amount	Description of Services
08/25/11	(b) (6)	0.3	(b) (6)	Strategy conference re additional new documents discovered during document review (.3) (No Charge)
08/25/11		1.5		Continue to review and analyze client files for documents relevant to EPA investigation (1.5)
08/26/11		0.3		Strategy conference re update on new information on leased property for accessories plant (.3)
08/26/11		2.4		Continue to review and analyze client files for documents responsive to EPA investigation (2.4)
08/26/11		0.5		Strategy conference re additional information received (.5) (No Charge)
08/29/11		2.1		Continue to review and analyze client files for documents responsive to EPA investigation (2.1)
08/30/11		0.5		Strategy conferences re status of review of documents and determination of privilege and confidential business information (.5)
08/30/11		2.6		Continue to review and analyze client files and identify documents responsive to EPA investigation (2.0); conference with Mr. Northrup of Streamline re document scanning/coding (.2); strategy conferences re document review status (.2) and re identifying documents subject to privilege in document review (.1); arrange for return of 20 boxes of documents to Iron Mountain (.1)
08/30/11		0.2		Review attorney names for privilege (.2) (No Charge)
08/31/11	ı	2.0		Review and analyze records center sheets for additional documents possibly responsive to EPA investigation and research Iron Mountain box numbers (2.0)
08/31/11		1.4		Continue to review documents and prepare chronology (1.4)

Three Rivers Management, Inc. 039391.0006 September 27, 2011

#### **Time Summary**

Professional	<u>Time</u>	Rate	<u>Amount</u>
(b) (6)	7.5	(b) (6)	
	6.1		
	36.5		
Summary Total:	50.1		\$9,945.00

Total fees:

\$9,945.00

Less reduction in fees:

-\$981.50

Total adjusted fees:

\$8,963.50

Total amount due:

\$8,963.50



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Remit Payments to: Post Office Box 3585 Portland, OR 97208-3585 . (503) 224-5858

October 21, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

Invoice: 537032

Account: 039391.0006 LDW - Kaiser Gypsum Company, Inc. - Environmental

## Summary of Account

	Fees	Disbursements	Total
CURRENT CHARGES - see attached	\$9,671.50	\$677.28	\$10,348.78
UNPAID BALANCE as of October 21, 2011	\$12,388.00	\$467.83	<u>\$12,855.83</u>
TOTAL AMOUNT DUE			<u>\$23,204.61</u>

# PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

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This statement may not include expense items for which we have not yet been billed, or navments received after the statement date. Employer Identification Number (b) (6)



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MILLER NASH LLP 3400 U.S. Bancorp Tower 111 S.W. Fifth Avenue Portland, OR 97204 (503) 224-5858

Invoice No: 537032

October 21, 2011

Three Rivers Management, Inc. Attn: Charles E. McChesney II Senior Counsel One Oxford Centre, Suite 3000 Pittsburgh, PA 15219-6401

For professional services through 09/30/11

Account: 039391.0006

Three Rivers Management, Inc.

LDW - Kaiser Gypsum Company, Inc. - Environmental

<u>Date</u>	<b>Professional</b>	Time	Description of Services
09/01/11	(b) (6)	1.1	Review historical documents re new information on KGC accessories plant (.6); strategy conference re potential new boxes containing relevant documents for EPA supplemental response (.5)
09/01/11		1.9	Continue review of records transfer sheets (1.5); strategy conference re records transfer sheets with possibly relevant information but for which we were unable to locate an Iron Mountain box number (.4)
09/01/11		0.1	Strategy conference re status (.1) (No Charge)
09/02/11		0.9	Strategy conference re review of site chronology, additional historical documents, and preparation of supplemental response to Section 104(e) requests (.9)
09/02/11		1.6	Strategy conferences re insurance coverage documentation, preparation of supplemental response to EPA, and materials inventory (.5); coordinate retrieval of additional boxes of documents for review from Iron Mountain (.1); strategy conference re document review and supplemental response to EPA (1.0)
09/06/11		0.2	Prepare documents for inclusion into Summation database (.2) (No

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Page 1

Charge)

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Three Rivers Management, Inc. 039391.0006 October 21, 2011

<u>Date</u>	<u>Professional</u>	<u>Time</u>	Description of Services
09/06/11	(b) (6)	1.1	Strategy conference re preparation of document and site chronology and status of document review (.7); review additional historical documents for preparation of supplemental response to Section 104(e) requests (.4)
09/06/11		0.8	Strategy meeting re document review (.8) (No Charge)
09/06/11		0.9	Correspondence and conference with Mr. Northrup re document scanning (.4); strategy conference re document review and preparation of EPA supplemental response (.5)
09/06/11		0.9	Strategy conference re document review (.9) (No Charge)
09/07/11		0.3	Strategy conference re documents showing delivery of raw materials to Seattle facilities (.3) (No Charge)
09/07/11		1.7	Continue to review and analyze client files for documents responsive to EPA investigation (1.7)
09/08/11		3.2	Continue to review and analyze client files for documents relevant to EPA investigation (2.8); strategy conference re insurance documents (.3); and re document review (.1)
09/09/11		1.8	Continue to review and analyze client files for documents responsive to EPA investigation (1.8)
09/09/11		0.2	Continue to look into database for responsive documents for preparation of supplemental response to section 104(e) request (.2)
09/11/11		0.8	Continue to review documents for responsiveness (.8)
09/12/11		0.5	Strategy conference re preparation of site chronology and supplemental response to Section 104(e) requests (.5) (No Charge)
09/12/11		2.7	Continue to review and analyze client files for documents responsive to EPA investigation (2.3); strategy conference re status of document review (.4)
09/12/11		1.3	Strategy conference re update of document review (1.1); continue reviewing documents (.2)
09/13/11		0.3	Strategy conference re additional documents concerning historical operations at Seattle facilities (.3) (No Charge)
09/14/11		0.1	Strategy conference re status of document review (.1) (No Charge)
09/14/11		2.1	Continue to review and analyze client files for documents responsive to EPA investigation (2.1)

Accounts Due and Payable Upon Receipt, Statements not paid within 30 days will accrue late charges at the rate of .75 percent per month (9 percent annually).

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This statement may not include expense items for which we have not yet been billed, or payments received after the statement date. Employer Identification Number (b) (6)

Three Rivers Management, Inc. 039391.0006 October 21, 2011

<u>Date</u>	Professional (b) (6)	<u>Tîme</u>	Description of Services
09/15/11	(b) (0)	1.1	Begin to prepare chronology of events (1.1)
09/16/11		3.2	Continue to review and analyze client files for documents responsive to EPA investigation (3.0); strategy conference re insolvent insurance carriers (.2)
09/16/11		0.1	Continue to prepare chronology (.1)
09/19/11		0.4	Strategy conference re preparation of supplemental Section 104(e) response and status of review of historical documents (.4)
09/19/11		1.3	Strategy conferences re review of insurance documents in connection with response to EPA request 5.d. (.4); conference with Mr. Northrup re document scanning (.1); continue to review and analyze client files for documents responsive to EPA investigation and prepare for scanning (.8)
09/19/11		1.4	Continue to prepare chronology (.4); strategy update session (1.0)
09/22/11		0.7	Prepare client documents for inclusion in Summation database (.7)
09/23/11		0.3	Continue to input chronology into Summation (.3)
09/24/11		0.7	Continue to review documents (.7)
09/26/11		0.5	Strategy conference re status of preparation of chronology and supplemental Section 104(e) response (.5)
09/26/11		0.3	Strategy conference re status of document review, preparation of chronology, and preparation of supplemental response to EPA (.3)
09/26/11		2.5	Attend strategy session re chronology (.9); continue to review documents and add to chronology (1.6)
09/28/11		0.3	Strategy conference re status of chronology and supplemental Section 104(e) response (.3) (No Charge)
09/28/11		1.7	Prepare chronology of events and supporting documents for Mr. Hill's review (1.7)
09/28/11		0.5	Continue to flag documents and prepare chronology (.5)
09/29/11		3.9	Review documents supporting draft chronology and supplemental response to Section 104(e) response (2.6); strategy conference re revisions to chronology and draft supplemental response (.7); revise draft chronology for Seattle gypsum operations (.6)

Three Rivers Management, Inc. 039391.0006 October 21, 2011

<u>Date</u>	Professional	<u>Time</u>	Description of Services
09/29/11	(b) (6)	5.4	Continue to analyze key documents for inclusion in chronology (4.7); strategy conference re chronology; (.2) continue to prepare documents for Mr. Hill's review (.5)
09/29/11		0.9	Strategy conference re chronology (.5); continue to review documents (.4)
09/30/11		0.2	Prepare and strategy conference documents for Ms. Wang's review (.2)
09/30/11		0.2	Strategy conference re additional information for preparing response to section 104(e) request (.2)

#### Time Summary

Professional (b) (6)	<u>Time</u>	Rate	Amount
(b) (b)	9.4	(b) (6)	
	11.0		
	28.7		
	0.8		
	0.2		
Summary Total:	50.1		\$10,523.50

#### . Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Document production charges by Streamline Imaging	677.28
Disbursement Total:	\$677.28

Total fees: \$10,523.50

Less reduction in fees: \$-852.00

Total adjusted fees: \$9,671.50

Total disbursements: \$677.28

Total amount due: \$10,348.78

If you have any questions regarding this invoice, please contact Steve Hill's assistant at 360-699-4771.

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This statement may not include expense items for which we have not yet been billed, or payments received effect the statement date. Employer Identification Numb( $\stackrel{\leftarrow}{b}$ ) (6)